

RECEIVED

RONNIE TOWNSEND*121142

2006 DEC 11 A 10:05

PLAINTIFF,

VS.

U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
CASE NO. 2:06-CV-564-MHT-CSC

CAPTAIN GEORGE EDWARD, AND
LIEUTENANT WILLIE COPELAND
DEFENDANTS.

RESPONS OF PLAINTIFF

COMES NOW PLAINTIFF, RONNIE TOWNSEND, BY AND THRO-
UGH PRO-SE, AND RESPONDS TO THE DEFENDANT ANSWER IN THE
ABOVE-STYLED ACTION. STATES AS FOLLOWS:

PLAINTIFF DENIES EACH AND EVERY MATERIAL ALLEGATION
MADE IN DEFENDANT SPECIAL REPORT, AND DEMANDS STRICT
PROOF THEREOF.

DEFENDANT DID VIOLATED PLAINTIFF DUE-PROCESS RIGHTS.

DEFENDANT DID CAUSED AND ALLOWED TO CONTINUE UN-
CONSTITUTIONAL CONDITION OF THE PLAINTIFF CONFINEMENT.

DEFENDANT DID CONSPIRED, RETALIATED AND DISCRIMIN-
-ATED AGAINST THE PLAINTIFF.

THE DEFENDANT HAVE FAILED TO REFUTE PLAINTIFF CLAIMS
THEREFORE BY LAW THOSE FACTS MUST BE TAKEN AS TRUE.

THE DEFENDANT IS MISLEAD COURT CONCERNING THE ST-
-ATUTE OF LIMITATIONS.

THE DEFENDANT IS NOT ENTITLED TO STATE AGENT IMMUNITY.

THE DEFENDANT IS NOT ENTITLED TO SOVEREIGN IMMUNITY UNDER ARTICLE I, SEC. 14 OF THE ALABAMA CONSTITUTION (1901).

THE DEFENDANT IS NOT ENTITLED TO IMMUNE FROM SUIT UNDER THE ELEVENTH AMENDMENT TO THE UNITED STATES CONSTITUTION.

THE DEFENDANT IS NOT IMMUNE FROM SUIT DUE TO QUALIFIED IMMUNITY.

RESPECTFULLY SUBMITTED
Rennie Townsend
RONNIE TOWNSEND
100 WARRIOR LANE
BESSEMER AL. 35023

ADDRESS OF COUNSEL:
OFFICE OF ATTORNEY GENERAL
BENJAMIN H. ALBRITTON
11 SOUTH LINDEN STREET
MONTGOMERY, AL. 36130

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE, THIS THE 12 DAY OF DECEMBER 2006, SERVED A COPY OF THE FOREGOING UPON BENJAMIN H. ALBRITTON COUNSEL FOR DEFENDANTS BY PLACING SAME IN THE UNITED STATES MAIL, POSTAGE PREPAID AND PROPERLY ADDRESSED AS FOLLOWS:

OFFICE OF ATTORNEY GENERAL
BENJAMIN H. ALBRITTON
11 SOUTH UNION STREET
MONTGOMERY AL 36130

Rennie Townsend
RONNIE TOWNSEND*121142
100 WARRIOR LANE
BESSEMER AL 35023